Part 5   STC Consultation

120   Overview

A
Background

The consultation process is a means for RMA and FSA to share and exchange FSA and RMA program information and to identify possible program areas of concern or discrepancies before they become effective. This information will include RMA crop program updates for existing programs, new programs, and program expansion. The consultation process will allow FSA the opportunity to review and make recommendations on policies, plans of insurance, and materials related to these policies or plans of insurance, including applicable final planting dates, assigned yields, and transitional yields (T-yields).

121   Responsibilities

A
RMA
Responsibilities

RMA shall designate an RO POC and an alternate POC to be responsible for the coordination of STC consultation requests with the FSA State Office POC.

B
RO POC
Responsibilities

RO POC shall:

- coordinate scheduling of requests with the State Office POC

- provide a request of actions to be taken

- provide State Office POC information for review in conjunction with the request for feedback

- upon receipt of an STC recommendation, provide a response of actions taken

- assign a tracking number to the consultation request and log request on AD-2006A (Exhibit 15) if initiated by RMA.

**C
STC
Responsibilities**

STC shall:

- if applicable, consult COC for input regarding requests for review of crop insurance program information

- review compiled data gathered by the State Office POC

- make recommendations to consultation requests submitted by RO POC

- when aware of program vulnerabilities in their State, STC must notify the State Office POC to initiate recommendation process

- identify, review, and recommend appropriate action to RO POC to change existing/proposed RMA T-yields, dates, practices, etc.

**D
State Office POC
Responsibilities**

The State Office POC shall:

- maintain communications with RO POC

- coordinate scheduling of requests with RO POC

- conduct a cursory review of the request provided by RO POC

- complete fact finding

121   Responsibilities (Continued)

D
State Office POC
Responsibilities
(Continued)

- provide STC and RO POC with supporting documentation including any written justification as appropriate to address identified concerns

- present the request and findings of fact to STC

- document and forward STC recommendations to RO POC

  Note: RO's addresses and States served are located in Exhibit 16.

- provide RO POC with STC written responses citing no concerns identified when appropriate

- assign a tracking number to the recommendation and log request on AD-2006A if initiated by STC or County Office.

E
COC
Responsibilities

COC's shall:

- review documents submitted by the State Office POC and provide recommendations on AD-2006

  Note: See Exhibit 17.

- respond to requests for input according to the State Office POC schedule

- identify and initiate recommendations if problems or concerns are identified with the crop insurance program

- when aware of program vulnerabilities in their county, COC must notify the State Office POC.

122   Overview

A
Background

This section describes the process for which RO will request STC to review and evaluate RMA MPCI program information. This process also provides a mechanism for RO to share and exchange crop program information with STC.

123   Types of Consultation Requests

A
RMA
Consultation
Requests

The type of requests submitted by RO to STC include but are not limited to the following:

- program dates

    Examples: Sales closing date, final planting date, initial planting date, etc.

- RMA T-yields

- statements (special provisions, MPCI crop policies, etc.)

- existing crop program expansion

- existing crop program deletion

- farming practices and crop types/varieties

- high-risk/unrated land.

124   Processing Consultation Request

**A
RO POC
Information**

RO POC shall:

- provide appropriate documentation and submit with AD-2006 (Exhibit 17) to the State Office POC

- complete the issue and background (including the level of review and deadlines for completion)

- inform the State Office POC of actions taken by RO as a result of the FSA recommendations.

**B
State Office POC
Information**

Regardless of where the AD-2006 request is initiated, the State Office POC shall:

- review the RMA request to determine whether all information is included for STC to review, evaluate, and provide a recommendation

  Note: If the State Office POC determines additional information is needed, the State Office POC:

    - may contact the County Office for additional or supporting information

    - will specify the information needed, appropriate format and deadlines.

- respond to the request by completing FSA State Office recommendations with supporting justification and documentation. See Section 3.

125-129   (Reserved)

130   Overview

A
Background

This section describes the process for which STC can initiate and recommend changes to RMA MPCI crop programs through the State Office POC. This process also provides a mechanism for the State Office to share and exchange crop program information with RMA.

131   Types of Consultation Recommendations

A
FSA
Consultation
Recommendation

The type of recommendations submitted by STC to RO include, but are not limited to, the following:

- program dates

    Examples: Sales closing date, final planting date, initial planting date, etc.

- RMA T-yields

- statements (special provisions, MPCI crop policies, etc.)

- existing crop program expansion

- existing crop program deletion

- farming practices and crop types/varieties.

132   Processing Consultation Recommendations

A
State Office POC
Information

The State Office POC shall:

- if requested by STC, research and justify issue or concerns

- review issues and recommendations submitted by COC's/offices along with supporting documentation

- complete the issue and background (including the level of review and deadlines for completion)

- review the FSA County Office/Committee recommendation to determine if all information is included for STC to review, evaluate, and provide a recommendation. If the State Office POC determines additional information is needed, the State Office POC:

  - may contact the County Office for additional or supporting information
  - will specify the information needed, appropriate format and deadlines.

    Note: Recommendations will be submitted through the State Office POC to the appropriate RO POC. Recommendations initiated by COC must be submitted to the State Office POC on AD-2006.

B
RO POC
Information

RO shall inform STC of actions taken by RO as a result of the recommendation.

133-139   (Reserved)

Section 3   Documentation

140   Required Minimum Documentation in Support of Recommended Program Changes

A
Required
Documentation   The County Office or STC shall use this table when initiating requests in support
                           of recommended program changes on policies, plans of insurance, and materials
                           related to these policies or plans of insurance. The State Office POC shall ensure
                           that the minimum listed documentation associated to the type of program change
                           is attached to AD-2006 in support of the recommendation.

Types of Requests Initiated by FSA	Minimum Documentation Needed in Support of the Program Change
Crop Expansion/Uninsured Practice/Type/Variety (P/T/V)	Type (for crop expansion) Practice Prices received (for crop expansion/type) Production history (yield per acre) Number of planted acres/producers Number of producers requesting insurance Market Evidence of adaptability
Planting Dates (Final/Initial)	Land grant universities Cooperative Extension Service Seed companies, etc.
RMA T-Yield	County yield history by P/T/V Cooperative Extension Service Land grant universities Other verifiable sources
Crop Program/P/T/V Deletions	Acreage trends Number of producers Loss of market/trends/processors

Note: For those types of requests initiated by RO for review, the State Office
           POC may contact RO POC for assistance as to the minimum supporting
           documentation required for the individual request. Additional
           documentation may be requested by RO POC from the State Office POC if
           further supporting documentation is required.

141-144   (Reserved)

145   General Timelines

A
Overview

At a minimum, the State Office POC and RO POC shall meet annually to discuss crop program changes made for the current crop year and issues to be reviewed for subsequent crop years. Periodic meetings throughout the year may occur if deemed necessary to discuss work load and priorities.

146   RO Requests

A
RO Deadlines

Deadlines for completion of FSA reviews and the submission of recommendations to RO POC's will be coordinated. These deadlines to the extent possible will ensure timely implementation of these recommendations. RO POC shall notify the State Office POC of the action taken within 60 calender days of receiving the recommendation from the State Office POC.

147   FSA Recommendations

A
FSA
Recommendation
Deadlines

FSA requests identifying crop program discrepancies and recommendations to correct such discrepancies can be initiated or submitted to RO POC at any time. Based on the nature of the request and findings, RO POC shall determine the appropriate action to be taken. RO POC shall notify the State Office POC of the action taken within 60 calender days of receiving the recommendation from the State Office POC.